HAZARDOUS WASTE FACILITY CERTIFICATE OF LIABILITY INSURANCE

- 1) AETNA LIFE AND CASUALTY OF 1020 31ST STREET, DOWNERS GROVE, ILLINOIS 60515 HEREBY CERTIFIES THAT IT HAS ISSUED LIABILITY INSURANCE COVERING BODILY INJURY AND PROPERTY DAMAGE TO AMES RUBBER CORPORATION, AMES AVON INDUSTRIES AND AMES INDUSTRIES, INC. OF 23-47 AMES BOULEVARD, HAMBURG, NEW JERSEY 07419 IN CONNECTION WITH THE INSUREDS OBLIGATION TO DEMONSTRATE FINANCIAL RESPONSIBILITY UNDER 40 CFR 264.147 OR 265.147. THE COVERAGE APPLIES AT: NJD 002389468 HAMBURG, HAMBURG, NEW JERSEY NJD 000818518 WANTAGE, WANTAGE TWP. NEW JERSEY FOR SUDDEN ACCIDENTAL OCCURRENCES. THE LIMITS OF LIABILITY ARE: 1,000,000/1,000,000 BI AND 100,000/100,000 PD EXCLUSIVE OF LEGAL DEFENSE COSTS. THE COVERAGE IS PROVIDED UNDER POLICY NUMBER 08 GL 95457 CCA (08 GL 95336 CCA) ISSUED ON 4/13/83. THE EFFECTIVE DATE OF SAID POLICY IS 5/1/83.
- 2) THE INSURER FURTHER CERTIFIES THE FOLLOWING WITH RESPECT TO THE INSURANCE DESCRIBED IN PARAGRAPH 1:

A) BANKRUPTCY OR INSOLVENCY OF THE INSURED SHALL NOT RELIEVE THE INSURER OF ITS OBLIGATIONS UNDER THE POLICY.

B) THE INSURER IS LIABLE FOR THE PAYMENT OF AMOUNTS WITHIN ANY DEDUCTIBLE APPLICABLE TO THE POLICY, WITH A RIGHT OF REIMBURSEMENT BY THE INSURED FOR ANY SUCH PAYMENT MADE BY THE INSURER. THIS PROVISION DOES NOT APPLY WITH RESPECT TO THAT AMOUNT OF ANY DEDUCTIBLE FOR WHICH COVERAGE IS DEMONSTRATED AS SPECIFIED IN 40 CFR 264.147(F) OR 265.147(F).

C) WHENEVER REQUESTED BY A REGIONAL ADMINISTRATOR OF THE U.S. ENVIRONMENTAL PROTECTION AGENCY (EPA), THE INSURER AGREES TO FURNISH TO THE REGIONAL ADMINISTRATOR A SIGNED DUPLICATE ORIGINAL OF THE POLICY AND ALL ENDORSEMENTS.

D) CANCELLATION OF THE INSURANCE, WHETHER BY THE INSURER OR THE INSURED, WILL BE EFFECTIVE ONLY UPON WRITTEN NOTICE AND ONLY AFTER THE EXPIRATION OF SIXTY(60) DAYS AFTER A COPY OF SUCH WRITTEN NOTICE IS RECEIVED BY THE REGIONAL ADMINISTRATOR(S) OF THE EPA REGION(S) IN WHICH THE FACILITY(IES) IS (ARE) LOCATED.

E) ANY OTHER TERMINATION OF THE INSURANCE WILL BE EFFECTIVE ONLY UPON WRITTEN NOTICE AND ONLY AFTER THE EXPIRATION OF THIRTY (30) DAYS AFTER A COPY OF SUCH WRITTEN NOTICE IS RECEIVED BY THE REGIONAL ADMINISTRATOR(S) OF THE EPA REGION(S) IN WHICH THE FACILITY(IES) IS (ARE) LOCATED.

I HEREBY CERTIFY THAT THE WORDING OF THIS INSTRUMENT IS IDENTICAL TO THE WORDING SPECIFIED IN 40 CFR 264.151(J) AS SUCH REGULATION WAS CONSTITUTED ON THE DATE FIRST ABOVE WRITTEN, AND THAT THE INSURER IS LICENSED TO TRANSACT THE BUSINESS OF INSURANCE, OR ELIGIBLE TO PROVIDE INSURANCE AS AN EXCESS OR SURPLUS LINES INSURER, IN ONE OR MORE STATES.

CRANTS ADMINISTRATION BREALING BRANCH BRANCH

RCRA INSPECTION REVIEW SHEET

Name of Facility - A-mes Rubber
RCRA ID= - NJ D000818518
Date of Inspection - NOV-17-81
Type of Inspection: Generator
Name of EPA/State Inspector -

Transporter

Mike Nalbone

Findings of Inspection: Site 15 managed properly waste management program is effective keeping company in compliance.

Action(s) Taken:

NONE

Action(s) Recommended:

RCRA GENERATOR INSPECTION FORM

COMPANY NAME: Ames Rubber EPA I.D. NUMBER: N. J. DO00818518
COMPANY ADDRESS! 4, 5 4.5
COMPANY CONTACT OR OFFICIAL: Sussex NJ. 07461 INSPECTOR'S NIME: M. Na bone
archeard .
Regulatory Affairs Specialist CHECK IF FACILITY IS ALSO A TSD DATE OF INSPECTION: DATE OF INSPECTION:
FACILITY VOV/17/81 DON'S YES NO HINCH
(1) Is there reason to believe that the facility has hazardous waste on site?
a. If yes, what leads you to believe it is hazardous waste? Check appropriate box:
Company admits that its waste is hazardous during the inspection.
// Company admitted the waste is hazardous in its RCPA notification and/or Part A Permit Application.
The waste material is listed in the regulations as a hazardous waste from a nonspecific source (§261.31)
// The waste material is listed in the regulations as a hazardous waste from a specific source (§261.32)
// The material or product is listed in the regulations as a discarded commercial chemical product (§261.33)
EPA testing has shown characteristics of ignitability, corrosivity, reactivity or extraction procedure toxicity, or has revealed hazardous constituents (please attach analysis report)
Company is unsure but there is reason to believe that waste materials are hazardous. (Explain)

			YES	<u>C7</u>	MON'T
	С.	Does each manifest (or a representative sample) have the following information?			
		- a manifest document number	<u>X</u>		
		 the generator's name, mailing address, telephone number, and EPA identification number 	<u>×</u>		· ·
		- the name, and EPA identification number of each transporter	X		
		- the name, address and EPA identification number of the designated facility and an alternate facility, if any:	<u>×</u>		
		- a description of the wastes (DOT)	X		
		- the total quantity of each hazardous waste by units of weight or volume, and the type and number of containers as loaded into or onto the transport vehicle	K	e de la companya de l	3,0
		 a certification that the materials are properly classified, described, packaged, marked, and labeled, and are in proper condition for transportation under regulations of the Department of Transportation and 	3,53		
		the EPA	X		
(5)		e there any hazardous wastes stored on site at the time the inspection?	X		
	a.	If "yes," do they appear properly packaged (if in containers) or, if in tanks, are the tanks secure?	<u>X</u>		
	b.	If not properly packaged or in secure tanks, please explain.			
	c.	Are containers clearly marked and labelled?	X		
	â.	Do any containers appear to be leaking?		<u>X</u>	
	e.	If "yes," approximately how many?			

Justes on Site: Wantage Two Site Haz ARDous 11,1, Trichloroethane - generated from vapor degreaser and from roll washings Eparts Celeaning Ketones - generated from excess material after each days processing Methylene Chloride - generated from cleaning machines waste water soluable oil - generated from rust in hibitor procedures on grinding machines. Polyweethane waste - generated from spray operations and from clean up procedures. MOCA generated from spraying applications and from clean up procedures. Lead (Lithoids) Liquid generated from cleaning and spraying operations solids generated from grunding and spraying operations

RCRA TREMIMENT, STORAGE AND DISPOSAL FACILITY INSPECTION FORM FOR TSD FACILITIES ONLY EPA I.D. Number: NJ D0008/85/8 Rubber COMPANY NAME: Rt #565 WANTAGE OTHER ENVIRONMENTAL PERMITS HELD 7 NPDES Joe Cerchiaro BY FACILITY: TITLE: Jairs Specia INSPECTOR'S NAME: TIME OF DAY INSPECTION TOOK PLACE: BRANCH/ORGANIZATION: NTDEP(1) Is there reason to believe that the facility has hazardous waste on site? If yes, what leads you to believe it is hazardous waste? Check appropriate box: Company admits that its waste is hazardous during the inspection. Company admitted the waste is hazardous in its RCRA notification and/or Part A Permit Application. $\overline{\ \ \ }$ The waste material is listed in the regulations as a hazardous waste from a nonspecific source (§261.31) The waste material is listed in the regulations as a hazardous waste from a specific source (§261.32) The material or product is listed in the regulations as a discarded commercial chemical product (§261.33) W YORK, N.Y. 10007 // EPA testing has shown characteristics of ignitability, corresivity, reactivity or extraction procedure toxicity, or has revealed hazardous constituents (please attach analysis report) // Company is unsure but there is reason to believe that waste materials are hazardous. (Explain) DON'T

b. Is there reason to believe that there are hazardous wastes on-site which the company claims are merely products or raw materials?

Please explain:

KNOM

OM

H/N(

Please explain your answers, and comment if necessary.

e. Are there any additional precautions which you handling procedures at the facility?

threaten human health or the environment?

device or facility containing the waste?

(7) Does the tacility comply with preparedness and prevention requirements including maintaining:

	3			DON'T
		YES	<u>C//</u>	<u>15:01</u>
	an internal communications or alarm system?	X		
-	a telephone or other device to summan emergency assistance from local authorities?			
-	portable fire equipment?	X	·	
_	adequate aisle space?	<u>×</u> ,		
-	in your opinion, do the types of wastes on site require all of the above procedures, or are some not needed? Explain.		, —	

In your opinion, do the types of wastes on site require all of the above procedures, or are some not needed? Explain.

*(8) Have you inspected to verify that the groundwater monitoring wells (if any) mentioned in the facility's groundwater monitoring plan (see no. 19 below) are properly installed?

If you have, please comment, as appropriate. .

- (9) a. Is there any reason to believe that groundwater contamination already exists from this facility? If "YES", explain.
 - b. Do you believe that operation of this facility may affect groundwater quality?
 - c. If "YES", explain.

RECORDS INSPECTION

(10) Has the facility received hazardous waste from an off-site source since Nov. 19, 1980 (effective date of the regulations)?

a. If "YES", does it appear that the facility has a copy of a manifest for each hazardous waste

	4	YES	<u> </u>	<u>EDA</u> ~
	- the generator's name, mailing address, telephone number, and EPA identification number			
	- the name, and EPA identification number of each transporter			
	 the name, address and EPA identification number of the designated facility and an alternate facility, if any; 		*****	
	- a DOT description of the wastes			
	 the total quantity of each hazardous waste by units of weight or volume, and the type and number of containers as loaded into or onto the transport vehicle 			
	 a certification that the materials are properly classified, described, packaged, marked, and labeled, and are in proper 			
	condition for transportation under regula- tions of the Department of Transportation and the EPA			
	d. Are there any indications that unmanifested hazardous wastes have been received since-November 19, 1980? If YES, explain.			
(11)	Does the facility have a written waste analysis plan specifying test methods, sampling methods and sampling frequency? (§265.13)	×		· .
	a. Does the character of wastes handled at the facility change from day to day, week to week, etc., thus requiring frequent testing? (You may check more than one) Waste characteristics vary All wastes are basically the same Company treats all waste as hazardous Don't Know	s.		
	b. Does hazardous waste come to this facility from off-site sources?		X	-
	c. If waste comes from an off-site source, are there procedures in the plan to insure that wastes received conform to the accompanying manifest?		<i>M</i>	A
(12)	INSPECTIONS (§265.15)			

13)	PERS	50:0	EL TRAINING (\$265.16)			
	a.	Is	there written documentation of the following	ŋ:		
		-	job title for each position at the facility related to hazardous waste management and the employee filling each job?	the		-
		-	type and amount of training to be given to personnel in jobs related to hazardous wast management?	×		
		_	actual training or experience received by personnel?	ye_		
(14)	fo fi ha	r e res zar	the facility have a written contingency plan mergency procedures designed to deal with , explosion or any unplanned release of dous waste? .51)	n ∀		
	a.		es the plan describe arrangements made with cal authorities?	*		
	b.		s the contingency plan been submitted local authorities?	$\overline{\lambda}$		·
1		НС	w do you know?	•		
	C.		es the plan list names, addresses, and cone numbers of Emergency Coordinators?	K		
	ď.		ses the plan have a list of what emergency cuipment is available?	X		
	е.		there a provision for evacuating facility ersonnel?	义		
	f.		es an Emergency Coordinator present or on all at the time of the inspection?	X		
(15)			the owner/operator keep a written operating d with: (§265.73)	Į		
	-		description of wastes received with methods dates of treatment, storage or disposal?	_		/A_
		loc	cation and quantity of each waste?	٠.		NA
	-	tro	tailed records and results of waste analysis satability tests performed on wastes coming cility?		the	NA

YES NO

		- an estimate of the maximum inventory of wastes in storage or treatment at any time during the life of the facility?	
		- a description of the steps necessary to decontaminate facility equipment during closure?	
		- a schedule for final closure including the anticipated date when wastes will no longer be received and when final closure will be completed?	· .
	b.	What is the anticipated date for final closure? when company ceases operations—	
	tc.		1
	d.	Does the written post-closure plan include:	
		- a description of planned groundwater monitoring activities and their frequencies during post-closure?	
		- a description of planned maintenance activities and frequencies to ensure integrity of final cover during post-closure?	<u> </u>
		- the name, address and phone number of a person or office to contact during post-closure?	
*(17)	of	pes the owner/operator have a written estimate the cost of closing the facility? (§265.142) hat is it?	
*(18)	est mor	pes the owner/operator have a written stimate of the cost for post-closure onitoring and maintenance? mat is it? (§265.144)	
*(19)	to ta:	as a groundwater monitoring plan been submitted the Regional Administrator for facilities conaining a surface impoundment, landfill or land reatment process? (This requirement does not oply to recycling facilities.) (§265.90)	
	a.	. Does the plan indicate that at least one monitoring well has been installed hydraulically upgradient from the limit of the waste mangement area?	_

SITE-SPECIFIC

please circle all appropriate activities and answer questions on indicated pages for all activities circled. When you submit your report, include only those site-specific pages that you have used.

STORAGE		TREATMENT		DISP	CSAL		
Waste Pile p. 9		Tank p. 8	*	Land	fill	pp. 10-	-11
Surface Impoundmo	nt p.8	Surface Impoundment pp.	8–9	Land	Trea p	tment p. 9,]	LO
Container p. 7		Incineration pp. 12-13			ace I p. 8	mpound-	•
Tank, above groun	d p. 8	Thermal Treatment pp. 12	-13	Othe	~		
Tank, below groun	d p. 8	Land Treatment pp. 9-10		Othe	L		
Other		Chemical, Physical p. 13 and Biological Treatment (other than in tanks, surface impounment or land treatment facilities) Other	d-	YES	<u>071</u>	DON'T KNOW	
	CON	TAINERS (§265.170)					
1. Are there any If "YES", exp	leaking		-	, .	X		
2. Are there any of leaking? If "YES", exp		ers which appear in dange	er -		X		
3. Do wastes approximaterials?	pear comp	atible with container		X			
4. Are all conta	ainers cl	osed except those in use?		<u> </u>			
or stored in	a manner	to be opened, handled which may rupture the hem to leak?			X.		
6. How often dos container sto		ant manager claim to inspeas?		ekt			

				DCH'T
	TANKS (9265.190)	YES	<u>110</u>	KNON
1.	Are there any leaking tanks? It "YES", explain.		-	
2.	Are there any tanks which appear in danger of leaking. If "YES", explain.	-		
	II III / CAPICITA			
,	· ,			
3.	Are wastes or treatment reagents being placed in tanks which could cause them to rupture, leak, corrode or otherwise fail? If "YES", explain.			·
4.	Do uncovered tanks have at least 2 feet of freeboard or an adequate containment structure?	~		
5.	Where hazardous waste is continuously fed into a tank, is the tank equipped with a means to stop this inflow?			
6.	Does it appear that incompatible wastes. are being stored in close proximity to one another, or in the same tank? If "YES", explain.			
7.	How often does the plant manager claim to inspect container storage areas?		•	
8.	Are ignitable or reactive wastes stored in			
	a manner which protects them from a source of ignition or reaction? If "YES", explain.			
9.	What is the approximate number and size of tanks containing hazardous wastes?			
	SURFACE IMPOUNDMENTS (§265.220)			
1.	Is there at least 2 feet of freeboard in the impoundment?			
2.	Do all earthen dikes have a protective			

	•					
4.	Are ignitable or reactive wastes being placed in surface impoundments without being treated to remove these characteristics? If "YES", explain.					
	₩					
5.	Are there any leaks, failures or is there any deteriorization in the impoundments? If "YES", explain.					
6.	Give the approximate size of surface impoundments (gallons or cubic feet).					
•						
	WASTE PILES (§265.250)				<u> </u>	
1.	Is the waste pile protected from wind erosion?				NEW YO	εά' .⊏_
	a. Does it appear to need such protection?				A SE	С.
	b. Explain what type of protection exists.	-				
2.	Does it appear that incompatible wastes are being stored in the same waste pile? If "YES", explain.				ž	r~.)
3.	Is leachate run-off from a pile a hazardous waste? If "YES", explain this determination and answer (a) and (b) below.				ŀ	ā
	a. Is the pile placed on an impermeable base that is compatible with the waste?					
	b. Is the pile protected from precipitation and run-on?	-			•	
4.	In your judgment, are ignitable or reactive wastes managed in such a way that they are protected from any material or conditions which may cause them to ignite? Please explain or indicate if no such wastes are present.					
	Are they placed on an existing pile so that they no longer meet the definition of ignitable or reactive waste?	ole ——				
				,		

DON'T

10. Are empty containers (e.g. those containing less than 1/2 inch of liquid) placed

in the landfille?

DO:1'T

INCINERATORS AND THERMAL TREATMENT (\$\$265.340 and 265.379) YES

	(§\$265.340 and 265.379)	100	220	DON'T
	en A	YES	\overline{NO}	HIOW _
1.	What type of incinerator or thermal treatment is at the site (e.g. waterwall incinerator, boiler, fluidized bod, etc.)?			
		<i>⊕</i>		
2.	Was hazardous waste being incinerated or			
	thermally treated during your inspection? If "YES", answer all following questions. If "NO", answer only questions 3 and 7.			
3.	Has waste analysis been performed (and written recoinclude:	ords ke	ept) t	0
	- heating value of the waste			
	- halogen content			
	- sulfur content	7		
	- concentration of lead			
	- concentration of mercury	-		
	os. series at the series of th			
TO	E: Waste analysis need not be performed on each was if there are documented data available to show we that do not vary. If there are such documented check here	aste c	harac	teristics ble,
4.	Does it appear that the owner/operator brings his thermal treatment process to steady state (normal) conditions of operation before introducing hazardous wastes?			
5.	Did it appear during your inspection that there was monitoring and inspection by owner/operator every 1 during hazardous waste incineration for:	adequ 5 minu	ate tes	
	- waste feed			
	- auxiliary fuel feed			
	- air flow		-	
	- incinerator temperature			-
	Considerate Alice			

The state of the s

	a.	If "YES", what is being burned? (only burning or detonation of explosives is permitted)				
		•	*			
	b.	. If open burning or detonation of explosives place, approximately what is the distance froburning or detonation to the property of oth		YES	<u>Си</u>	DON'T
5.	p	onces the incinerator appear to be operating or operating or operating or operating or operating and system alarms seem to be in good working order?) Please explain.				R
	ā	a. Is there any evidence of fugitive emissions	?			
7.	ł	Is the residue from the incinerator treated by the owner as a hazardous waste? Please explain.	,			
			4			-
8.		What types of air pollution control devices (if are installed on the incinerator? CHEMICAL, PHYSICAL AND BIOLOGICAL TREATMENT (
			-			
1	•	Does the treatment process system show any signs of ruptures, leaks, or corrosion? please explain.				
2)	Is there a means to stop the inflow of continuously-fed hazardous wastes?				
. 3	3.	Is there ignitable or reactive waste fed into the treatment system?		_		
		If "YES", has it been treated or protected from any material or conditions which may cause it to ignite or react? If so, explain how.				
		Are the incompatible wastes placed in the same treatment process? If "YES", explain.				
	5.	Describe the treatment system at this facility	Υ.			





State of New Jersey

DEPARTMENT OF ENVIRONMENTAL PROTECTION

DIVISION OF WASTE MANAGEMENT 120 Rt. 156, Yardville, N.J. 08620

JACK STANTON DIRECTOR LINO F. PEREIRA
DEPUTY DIRECTOR

AUG 09 1983

Ames Rubber Joseph Cerchiaro Route 565 Wantage, New Jersey 07461

RE: NOTICE OF VIOLATION AND PENALTY SETTLEMENT OFFER FAILURE TO ESTABLISH FINANCIAL ASSURANCE FOR CLOSURE AND POST-CLOSURE AND TO DEMONSTRATE FINANCIAL RESPONSIBILITY FOR CLAIMS EPA I.D. #NJD000818518

Dear Mr. Cerchiaro

Pursuant to the provisions of New Jersey Solid Waste Management Act, N.J.S.A. 13:1E-1, et seq., the Department of Environmental Protection has determined by examination of our files that you violated N.J.A.C. 7:26-9.10(e) and 9.11(c) in that you have failed to establish and/or submit to the Department financial assurance for closure and post-closure of the facility, and N.J.A.C. 7:26-9.13 in that you have failed to demonstrate financial responsibility for claims arising from the operations of your facility for sudden or non-sudden and accidental occurrences that cause injury to persons or property.

NOW, THEREFORE, YOU ARE HEREBY NOTIFIED that your facility shall submit the required documents within thirty (30) days of receipt of this Notice to: Frank Coolick, Bureau of Hazardous Waste Engineering, 32 East Hanover Street, Trenton, New Jersey 08625.

Further, N.J.S.A. 13:1E-9c provides for maximum civil penalties of \$25,000 per day for violations of this nature. In accordance with N.J.S.A. 13:1E-9d, the Department is amenable to compromise and settle this statutory claim for penalties for the aforementioned violations for the sum of \$2,000.

Should you decide to accept this Penalty Settlement Offer, payment must be made within thirty (30) days of your receipt of this letter. Only checks or money orders drawn to the New Jersey Department of Environmental Protection will be accepted.

New Jersey Is An Equal Opportunity Employer

EOSOZ





Should you decide not to accept this Penalty Settlement Offer or fail to forward payment within thirty (30) days of receipt of this letter, this offer is rescinded and this matter will be referred to the Office of the Attorney General for the initiation of litigation seeking the full penalties allowed by law.

Acceptance of this Penalty Settlement Offer does not relieve you from immediately complying with the sections of the New Jersey Administrative Code cited above. Each day the violation continues shall be considered a separate violation subject to penalties of up to \$25,000 per day.

If you have questions regarding this Notice of Violation and Penalty Settlement Offer, please call the Bureau of Compliance and Enforcement at (609) 292-0967. If you have questions regarding the documents to be submitted, please call the Bureau of Hazardous Waste Engineering at (609) 292-9880.

Date:

DJS:kas

.

Jøseph A. Rogalski Assistant Director KOVACH & FITZGIBBONS

A PROFESSIONAL ASSOCIATION

ATTORNEYS-AT-LAW

MAIN OFFICE BUILDING 35 MAIN STREET FRANKLIN, N. J. 07416 September 21, 1983

DONALD L. KOVACH WILLIAM F. FITZGIBBONS ERWIN G. GOOVAERTS

(201) 827-6117

U.S. Environmental
Protection Authority
26 Federal Plaza
New York, New York 10278

Subject: 40 CFR 265.143 Compliance

Financial Assurance for

Closure

Re: NJD 000818518, 002389468

Ames Rubber Corporation

Att: Richard Baker

Permits Administration

Branch

Dear Mr. Baker:

Subsequent to my letter to you of September 9, 1983 on behalf of Ames Rubber Corporation, I have been advised by a Mr. Robert Patel of the New Jersey Environmental Protection Agency that the NJDEP will be the administering agency of the trust agreement and not the USEPA.

I would appreciate it if you could confirm your agreement or disagreement with this position.

Very truly yours,

William F. Fitzgibbons

WFF/kk

cc: Ames Rubber Corporation

Att: Patrick J. Fitzgibbons

cc: Ames Rubber Corporation

Att: Joseph Cerchiaro



Hamburg, New Jersey 07419

201-827-9101

TWX 7IO-988-324I

May 13, 1983

Mr. Joseph Czinan Grants Administration Branch Room 937-A U. S. E. P. A. Region II 26 Federal Plaza New York, New York 10278

Subject: 40 CFR 265.147 Compliance - Hazardous Waste Facility Certificate

of Liability Insurance

Reference: NJD 002389468, NJD 000818518

Dear Mr. Czinar:

Enclosed you will find a copy of the Hazardous Waste Facility Certificate of Liability Insurance for our two facilities (NJD 000818518, NJD 002389468). We are currently still working on the closure trust fund to satisfy 40 CFR 265.143.

We commend your department for it's patience and guidance in helping us attain a policy that best suits our needs even though we were unable to accomplish it by the deadline established by the regulations.

Ames Rubber Corporation has attempted to understand and comply with the complete regulations set forth under the Resource Conservation and Recovery Act (RCRA) and with your continued cooperation will meet the requirements of this legislation.

Very truly yours,

Joseph R. ali Joseph R. Cerchiaro

Manager of Regulatory Affairs

JRC:jr Enc.

ENVIRONME AGENCY 1000T cc: Mr. Richard Baker

Midwest Office

2537 Curtiss Street

Downers Grove, Illinois 60515

312-964-2440

AMES
RUBBER
CORPORATION
Ames Boulevard Hamburg, No

Hamburg, New Jersey 07419

201 827-9101

TWX 710-988-3241

February 18, 1983

Mr. Richard Baker
Permits Administration Branch
Room 432
U. S. E. P. A.
26 Federal Plaza
New York, New York 10278

NJD002389468

Dear Mr. Baker:

We are in receipt of your letter showing us to be deficient in the financial requirements dictated by 40 CFR Part 265.143 and 40 CFR Part 265.147. The letter also stated that we had twenty (20) days to supply your office with the necessary information.

In recognizing that we will be unable to meet the twenty day deadline and realizing we failed to meet the July deadlines, because of problems in trying to secure an adequate plan for our needs, we ask for your indulgence and grant us an another twenty day extension.

We plan on meeting with an insurance carrier on Thursday, February 24th. If things progress as expected, we will be able to satisfy our financial requirements and forward all the necessary documents to your office, immediately.

Ames Rubber Corporation has always acted in a highly responsible manner and intends to do so in the future and with your patience and guidance, we will be able to settle this matter in an appropriate fashion and in a compliance posture that serves everyone's best interests.

Very truly yours,

Joseph R. Cerchiaro

Joseph R. Cuch

Regulatory Affairs Specialist

JRC:jr

cc: Mr. Joseph Czinar,

Grants Administration Branch

PAG LI II THE LUTION HE TORNING

referred sur

NJ

Midwest Office

2537 Curtiss Street

Downers Grove, Illinois 60515

312-964-2440



PERMITS ALM'E BRANCH MAR 10 2 119 PM '83

TWX 710-988-3241

March 8, 1983

Mr. Richard Baker Permits Administration Branch Room 432 U.S. E.P.A. 26 Federal Plaza New York, New York 10278

40 CFR 265.143 Compliance - Financial Assurance for Closure

Reference:

NJD 000818518, 002389468

Dear Mr. Baker:

In an effort to comply fully with the subject regulation Ames Rubber Corporation will establish a closure trust fund.

I have contacted our attorney and the trust department of our bank in order to prepare and execute the appropriate trust document. I have attached copies of my letters to both parties.

As soon as these arrangements are completed and formalized I will have the documents forwarded to the appropriate EPA officials, per the regulation.

We realize that we are deficient in meeting the required deadlines but we ask your consideration of extension of the due dates so that we may complete the requirements.

Sincerely,

RUBBER CORPORATION

Patrick Fitzgibbens

Vice President

Finance and Administration

Mr. Joseph Czinar Grants Administration Branch

PF/1d

Encs Midwest Office

2537 Curtiss Street

Downers Grove, Illinois 60515

312-964-2440

201 827-9101

TWX 710-988-3241

March 8, 1983

National Community Bank 120 Hampton House Road Newton, New Jersey 07860

Attention:

Mrs. Annabel Norman

Trust Officer

Subject:

EPA - Trust Fund Requirement

Dear Mrs. Norman:

Confirming our discussion of last week about the EPA Trust Fund required, I have enclosed a copy of the Federal Register dated January 12, 1981.

Please refer to page 2885, 265.151, which indicates acceptable language for an appropriate trust document.

I would appreciate it if you could have this statute reviewed and determine if National Community Bank would be willing to act in the capacity of trustee.

I would be more than willing to discuss this requirement with your people if they should require additional information.

Thank you for your help with this matter.

Sincerely,

AMES RUBBER CORPORATION

Patrick Fitzgibbons
Vice President
Finance and Administration

cc: W.F. Fitzgibbons

R.M. Glidden
J.D. Marvil
J.R. Cerchiaro
L.C. Ryder

PF/1d

Midwest Office 2537 Curtiss Street Downers Grove, Illinois 60515 312-964-2440 Encs.

201 827-9101 TWX 710-988-3241

March 8, 1983

Kovach & Fitzgibbons 35 Main Street Franklin, New Jersey 07416

Attention: Mr. William F. Fitzgibbons

Subject: EPA - Hazardous Waste Management System

Interim Status Standards Respecting Closure, Care and

Financial Responsibility

Dear Bill:

Confirming our telephone conversation of March 3, 1983, I have enclosed copies of several documents which spell out certain requirements of Ames Rubber in order that we conform to Federal/State regulations.

It is our current understanding that we will have to provide financial assurance for facility closure because we do store certain quantities of materials covered by these statutes.

While various options are available to provide this financial assurance, I believe that the most practical measure seems to be the establishment of a closure trust fund which can be funded over a twenty year period.

In the Federal Register dated January 12, 1981, page 2852, 264.143, it states that the trustee must be a bank or other financial institution whose trust operations are examined by a Federal or State agency.

Would you please look over the wording of the trust document spelled out in the Federal Register of January 12, 1981, page 2885, 265.151, to see if the wording is acceptable so that we know up front what is demanded of us.

I am also sending a copy of these documents to Mrs. Annabel Norman of the National Community Bank Trust Department. Mrs. Norman will review these documents to see if NCB could live with this as trustee.

Section 265 covers Interim Status Standards which corresponds to our permit application status.



Kovach & Fitzgibbons W.F. Fitzgibbons EPA - Hazardous Waste Management System March 8, 1983

If you have some questions after looking these documents over, please give me a call so that we can proceed with National Community Bank.

Sincerely,

AMES RUBBER CORPORATION

Patrick Fitzgibbons
Vice President
Finance and Administration

cc: Mrs. Annabel Norman NCB Trust Officer

> R.M. Glidden J.D. Marvil C.A. Roberts J.R. Cerchiaro L.C. Ryder

PF/1d

Encs.



Hamburg, New Jersey 07419

201 827-9101

TWX 7IO-988-324I

February 18, 1983

Mr. Richard Baker Permits Administration Branch Room 432 U. S. E. P. A. 26 Federal Plaza 10278 New York, New York

Dear Mr. Baker:

We are in receipt of your letter showing us to be deficient in the financial requirements dictated by 40 CFR Part 265.143 and 40 CFR Part 265.147. The letter also stated that we had twenty (20) days to supply your office with the necessary information.

In recognizing that we will be unable to meet the twenty day deadline and realizing we failed to meet the July deadlines, because of problems in trying to secure an adequate plan for our needs, we ask for your indulgence and grant us an another twenty day extension.

We plan on meeting with an insurance carrier on Thursday, February 24th. If things progress as expected, we will be able to satisfy our financial requirements and forward all the necessary documents to your office, immediately.

Ames Rubber Corporation has always acted in a highly responsible manner and intends to do so in the future and with your patience and guidance, we will be able to settle this matter in an appropriate fashion and in a compliance posture that serves everyone's best interests.

Very truly yours,

Ĵoseph R. Cerchiaro

Joseph R. Cud'

Regulatory Affairs Specialist

JRC:jr

cc: Mr. Joseph Czinar,

Grants Administration Branch



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

MAY 2 5 1883

REGION II 26 FEDERAL PLAZA NEW YORK, NEW YORK 10278

MAY 2 6 1983

Mr. George Tyler
Assistant Commissioner for
Environmental Management and Control
New Jersey Department of
Environmental Protection
Labor and Industry Building, Room 805
P.O. Box CN 402
Trenton, New Jersey 08625

Dear Mr. Tyler:

On January 31, 1983, the Environmental Protection Agency (EPA) Region II sent 302 warning letters (sample copies enclosed) to owners and operators of hazardous waste facilities which were not in compliance with EPA's financial responsibility regulations. These regulations became effective in July 1982 and required facilities to demonstrate that funds are available for:

- meeting their obligations under the Resource Conservation and Recovery Act (RCRA) for proper closure and post-closure care of their facilities (i.e., "financial assurance"); and
- ° compensating others for bodily injury or property damage caused by accidents arising from operations of the facilities (i.e., "liability insurance").

The following is to summarize industry's compliance to date (or lack thereof) with the Federal financial responsibility regulations. See the enclosed computer printout for a listing of the facilities in compliance with the Federal regulations. Also enclosed is a listing of the facilities within each non-compliance category.

- Number of facilities which have submitted all required documents (including those facilities that have utilized the financial test and corporate guarantee methods of compliance) 279
- Number of facilities which demonstrated financial assurance only

Number of facilities which demonstrated liability insurance only

28

56

Number of "non-submitters" (excluding facilities which either closed or requested to be declassified as hazardous waste facilities)

The above numbers indicate that 94 facilities are in violation of the Federal and State financial responsibility requirements. Our concern is whether the State or EPA should proceed with enforcement follow-up activities for these 94 facilities. The State's financial regulations, which have been in effect since October 1981, are even more stringent than the Federal regulations in that they do not provide facilities with the option of using the corporate guarantee or the financial test for demonstrating proof of financial assurance and liability insurance. Two hundred and thirty facilities have utilized these alternative methods (see the enclosed computer printout for a listing of facilities which employed these methods). Now that New Jersey has received Phase I interim authorization, the State is responsible for enforcing financial regulations in lieu of EPA. However, the . Phase I Memorandum of Agreement (MOA) does provide that EPA can initiate enforcement actions in cases where the State does not initiate timely and appropriate enforcement actions against violators. Regardless of which Agency takes the lead, enforcement actions must be based on the State's financial regulations (see enclosed EPA guidance on enforcement actions in authorized States)

Please notify me within the next two weeks as to the State's plan of action (including time frames) for conducting follow-up enforce ment activities for the 94 facilities identified in the enclosure. (Of course, some of these facilities may have already provided the State with financial documentation pursuant to State regulations and would therefore not be considered enforcement candidates by New Jersey.) My staff and I are ready to provide assistance to New Jersey in implementing this high priority portion of the State's Phase I hazardous waste program. Alternatively, if the State chooses not to take the enforcement lead at this time, EPA is ready to proceed with initiating said enforcement actions and will keep New Jersey informed of its activities.

Your cooperation on this matter is appreciated.

Sincerely yours,

Conrad Simon

Director

Air & Waste Management Division

Enclosures

cc: Michael DeBonis

Asst. Director for Planning and Resource Recovery, NJDEP (w/o encl.)

CNO

N.J. Facilities Which Submitted No Financial Instruments (tctal - 56)

EPA I.D. No.	Name:	City
NJD000316778	Frinceton Biomedix	West Windsor Township
NJD000540662	Jensey Smelting & Refining	Jersey City
NJD000632240	Cylinder Maintenance Corp.	Kearny
NJD000692350	PNC Inc.	lutley
NJD000692467	Interchemical Petroleum Corp- Eastern Inc.	Little Ferry
NJDC00694307	Quanta Resources Corporation	Edgewater
NJDCG0765123	Polarome Manufacturing Co., Inc.	Newark
NJD000818518	Ames Rubber Corp, Vantage Plant	Wantage
NJD001394089	Synkote Paint Company	Elmwood Park
NJD001915800	James J. Kealing Inc.	Perth Amboy
NJD002008118	H & S Chemical Company Inc.	Wallington
NJD002141711	John L. Armitage & Cc.	Newark
NJD002141950	CP Chemicals Inc.	Sewaren
NJD002147643	Precision Resistor Co., Inc.	Hillside
NJD002160471	Excel Products Co., Inc.	New Brunswick
NJD002177640	C-D I Dispersions	Newark
NJD002193001	Johanson Marufacturing Corp.	Ecenton
NJD002200913	John B. Moore Corporation	South Amboy
NJD002327963	Materials Elec Pdc; Corp.	Trenton
NJD002344190	United States Bronze Powders	Flemington
NJD002349751	Struthers-Dunn, Inc.	Fitman
NJD002385664	Vineland Chemical	Vineland
NJD002389468	Ames Rubber Corp. Hamburg Plant	Hamburg

EPA I.D. No.	Name.	City
м.тос2457174	GMC New Departure Hyatt Learnings Clark	Clark
NJD002482545	Viking Yacht Company	New Gretna
NJD002561652	Amax Speciality Metals	Florham Park
NJD002561868	Drew University	Madison
NUD011728656	Keystone Metal Pinisbers, Inc.	Secaucus
NJD012888525	Middletown Leather Co., Inc.	Hackettstown
NJD044081222	Hurmel Chemical Company	South Plainfield
NUD044638935	Arsynco, Inc.	Carlstadt
MJD046251268	Sandvik, Inc.	Fair Lawn
N.JD049544438	Diamond Aerosol Corporation	Glen Gardner
NJD061347860	Coulf Inc. Endustrial Fattery Div.	Saddle Brook
NJD067362087	Lilly Industrial Coatings, Inc.	Paulsboro
NJD067484923	E L Beth Ltd.	Perth Amboy
NJD068292648	Standard Tank Cleaning Corp.	Bayonne
NJD076056234	BEI Chemical Services, Inc.	Pedricktown
NJ5077C91569	Associated Packaging, Inc.	Hurffville
NJD077549772	Ceceral Marine Transport Corp.	Bayonne
NJD080602568	Ford Building & Construction Co. Inc.	Kearny
NJD081394741	Valumen Processing Corp. of N.J.	Sayreville
NJD027286038	Ideal Plating & Polishing Co., Inc.	Belleville
NJD093846301	Custom Chemicals Company	Elmwood Park
МДФ094950333	Presto, Incorporated	Newark
NJDJ96876438	Tress Chemical Company	Newark
NJD098162704	San Juan International	Trenton .

EPA I.D. No.	Name	<u>City</u>
NJD930525633	IT Corporation	Ediscn
NJD980526867	Shielding Technology	Piscataway
NJD980535959	Marko Engraving & Art Corp.	Fairview
NJD980594022	E.L. Beth Ltd,	Ediscn
NJD980642888	Kelbro, Inc.	Camden
NJD991304148	Viking Terminal Company	Sayreville
NJT00C028134	Barone Barrel & Drum Company	Paterson
NJT350011144	Exxon Bayonne Plant	3ayonne
NJT350014585	Campbell Foundry Company	Kearny

N.J. Facilities Which Submitted Liability Insurance Only (total - 28)

	EPA I.D. No.	Name	City
	NJD000304732	Becton Dielinson & Company	E. Rutherford
	HJD000310417	Grow Group Inc. Devoe Marine Coatings Co.	Pennsauken
	NJD000313477	MAPPI Trucking Comp.	Old Bridge Towns
	NJD000831461	Princecon Circuit Boards, Inc.	Treuton
_	NCD001392670	Hernetite Div. Mundet Industries Inc.	Carlstadt
	NUD001399013	Crelice Chemical Contings Inc.	Irvington
	NJDC02137313	Rosson Matals Corporation	Newark
	NJD002139145	Flint Ink Corporation	Lodi
	NJD002151322	Fairmount Chemical Co., Inc.	Newark
	NJD002153067	Pritzche Dodge & Olcott Inc.	Clifton
	NJDC02155443	Cessua Aircraft	Boonton
	NJD002395382	Ingersoll-Rand Company	Fhillipsburg
	NCD002458342	Sun Chemical Corporation Pigments Div.	Newark
	NJD002491116	Deptior& Plating Company	Deptford
	NJD011394467	Standard T Chemical Co., Inc.	Linden
	NJD042793076	Matheson Division Searle Medical Prods.	East Rutherford
	NJD042797571	Rackensack Medical Center	Hackensack
/	NJDC44081354	Meller Chemicals, Inc.	Averel
	NJD046556486	Kinsley's Landfill, Inc.	Daptford
	NJD047354832	Accurate Forming Corp.	Hamburg
	NJU049143563	Birk Paint Manufacturers, Inc.	Jersey City
	NLT0049360336	Kin-Buc Inc.	Edison
	NJC064981989	B & L Corporation	Newark
	MJD079304783	Clay Adams Div. of Becton Dickinson & Co.	Parsippany
	NJD030796732	Congoleum Resilient Flooring Div.	Trenton
	NJD096873500	Co-Operative Industries	Chester
	NJD990753493	Vanguard Fesearch Assoc., Inc.	South Plainfield
	NJL067507368	Westwood Lighting Group, Inc.	Paterson

N.J. Facilities Which Submitted Financial Assurance Only (total - 10)

EPA I.D. No.	Name	City
NJD000314674	Onyx Division Millmaster Onyx Group	Jersey City
NJD000314682	Lyndal Chemical Division	Lyndhurst
NJD001660786	Datascope Corp.	Oakland
NJD002165371	Inmont Corp. Hawthorne Plant	Hawthorne
NJD002442549	Curtis-Wright	Fairfield
NJD002444958	Inmont Corporation	Middlesex
NJD065815771	Alcan Ingot & Powders	Union
NJD094951258	A. Gross & Company	Newark
NJD095171930	Colonial Frinting Ink Company	East Rutherford
MJD095171948	United States Printing Ink	East Rutherford

Report run on: November 18, 2014 - 12:55 PM

Version 5.0

User Selection Criteria

Handler ID: Handler Name: Location: NJD000818518 New Jersey, all activities Group of IDs: Activity Location: None Chosen None Chosen

Handler Universe: All Facilities Regardless of Universe

Determined Date Range: From: 10/01/1980 To: 11/18/2014

Location County Code: None Chosen

State District: None Chosen

Region, State, Handler Name

Location Zip Code: Location City: Focus Area: Violation Type: **Evaluation Type:**

Display Code Descrip.: Yes

Display Universes: Yes

Results

Sort Order:

Data meeting the criteria you selected follows.

Total Pages:6 Total Handlers:1

Report Description

actions and referrals, and State to EPA referrals; all other enforcement actions are released. no violations were determined. Violation without enforcement actions does not always mean no enforcement action will be issued. In order to avoid evaluations, violations, and enforcement actions meeting the criteria supplied by the user. Evaluations showing no violations does not always indicate that releasing enforcement sensitive information to the public the following information is not shown on the report: pending civil / judicial referrals, criminal This report presents available information from the Resource Conservation and Recovery Act Information System (RCRAInfo) about compliance

Report Information

Name:

Developed by cme_foia.rdf
EPA Headquarters, Office of Enforcement and Compliance Assurance
June 2006
May 2012

Deployed:

Last Updated

Contact: rcrainfo.help@epa.gov

Tables Used: cmecomp3, ccitation3, hreport_univ5, lu_citation, lu_state, hid_groups

Libraries:

none

Report run on: November 18, 2014 - 12:55 PM

Page 2

AMES RUBBER CORP	,	County N	County Name / Code: SUSSEX / NJ037	NJD000818518
Location: 1440 RT 565; WANTAGE TWP, NJ 07461	, NJ 07461			REGION 02
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Violation: Activity Location: NJ Typ Scheduled Compliance Date: 10/04/1996	e: 262.A	Determined Date: 09/19/1996 Actual Compliance Date: 09/20/1996	Determined by Agency: State 1996 RTC Qualifier: OBSERVED	Responsible Agency: State /ED Sequence Number: 7
CSE Evaluation 09/21/1996 Citizen Complaint: NO	Activity Location: NJ Multimedia Inspection: NO	By: State Sampling: NO	Identifier: 000 Person: NJBF Not Subtitle C: NO Day Zero:	Branch: N Found Violation: YES Focus Area:
NRR Evaluation 09/20/1996 Citizen Complaint: NO	Activity Location: NJ Multimedia Inspection: NO	By: State Sampling: NO	Identifier: 000 Person: NJBF Not Subtitle C: NO Day Zero:	Branch: N Found Violation: YES Focus Area:
CEI Evaluation 09/19/1996 Citizen Complaint: NO	Activity Location: NJ Multimedia Inspection: NO	By: State Sampling: NO	Identifier: 000 Person: NJBF Not Subtitle C: NO Day Zero:	Branch: N Found Violation: YES Focus Area:
Enforcement: Activity Location: NJ Docket: CA Component: N	Ti, Disposition Statu	/pe: 120 Agency: State is:	Action Date: 09/19/1996 Responsible Person: NJFA Appeal Initiated:	Identifier: 000 Branch: N Appeal Resolved:
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CEI Evaluation 08/31/1994 Citizen Complaint: NO	Activity Location: NJ Multimedia Inspection: NO	By: State Sampling: NO	Identifier: 000 Person: NJBF Not Subtitle C: NO Day Zero:	Branch: N Found Violation: YES Focus Area:
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CEI Evaluation 08/31/1994 Citizen Complaint: NO	Activity Location: NJ Multimedia Inspection: NO	By: State Sampling: NO	Identifier: 000 Person: NJBF Not Subtitle C: NO Day Zero:	Branch: N Found Violation: YES Focus Area:

^{*} Note: Penalty amount may not reflect all violations cited.

Report run on: November 18, 2014 - 12:55 PM

Page 3

Enforcement: Docket: CA Comp	NRR Evaluation Citizen Cor CEI Evaluation Citizen Cor	Littorcement: Docket: CA Comp Violation: Activity Scheduled Con	Scheduled Composition NRR Evaluation Citizen Con CEI Evaluation Citizen Con	Violation: Activity Location: NJ Scheduled Compliance Date: NRR Evaluation 06/03/199 Citizen Complaint: NO CEI Evaluation 04/28/199 Citizen Complaint: NO Enforcement: Activity Loc. Docket: CA Component: N	AMES RUBBER Enforcement: Docket CA Comp
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^{*} Note: Penalty amount may not reflect all violations cited.

AMES RUBBER CORP, NJD000818518, WANTAGE TWP, NJ, continued -

N.J Type: 262.A	Found Violation: NO	Branch:	1	Person:	Identifier: 003	By: State	Activity Location: NJ	01/20/1984	NRR Evaluation 01/20/1984
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NJ Type: 262.A Determined Date: 02/03/1983 Determined by Agency: State Responsible / ate: 09/09/1983 Activity Location: NJ By: State Identifier: 001 Person: Branch: O Multimedia Inspection: NO Sampling: NO Not Subtitle C: NO Day Zero: Location: NJ Type: 120 Action Date: 08/09/1983 Identifier: 001 Responsible Person: Branch: Agency: State Responsible Person: Branch: Appeal Initiated: Appeal Initiated: Appeal Ferson: Appeal	Found Violation: NO Focus Area:	Branch: N 06/16/2011	OMLE Day Zero:	Person: C NO	Identifier: 001 Not Subtitle C: I	By: State Sampling: NO	Activity Location: NJ Multimedia Inspection: NO	06/16/2011 blaint: NO	CEI Evaluation Citizen Comp
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e: 262.A Determined Date: 02/03/1983 Determined by Agency: State Responsible / Actual Compliance Date: 09/23/1990 RTC Qualifier: OBSERVED Seque livity Location: NJ By: State Identifier: 001 Person: Branch: Branch: Ultimedia Inspection: NO Sampling: NO Not Subtitle C: NO Day Zero:	งal Resolved:	Identifier: 001 Branch: Appe		983 erson: ated:	Action Date: 08/09/1 Responsible P Appeal Initi	ency: State	Ti Disposition Statu	Activity Location: ent: N	Enforcement: Activity Docket: CA Component: N
e: 262.A Determined Date: 02/03/1983 Determined by Agency: State Respon Actual Compliance Date: 09/23/1990 RTC Qualifier: OBSERVED	Found Violation: YES Focus Area:	Branch:	Day Zero:	ers	Identifier: 001 Not Subtitle C:	By: State Sampling: NO	Activity Location: NJ Multimedia Inspection: NO	02/03/1983 plaint: NO	NRR Evaluation 02/03/1983 Citizen Complaint: NO
	ble Agency: State equence Number: 1	Respon	State er: OBSERVI	by Agency: RTC Qualifie		Determined Date: 02/03/198: ual Compliance Date: 09/23/	e: 262.A	ocation: NJ ance Date: 09/09/	Violation: Activity L Scheduled Compli

Total Number of Handlers:
Total Number of Activity Locations:

^{*} End of Report *

^{*} Note: Penalty amount may not reflect all violations cited.

Description of codes used on the report:

Universes	Description of Universes
Generator	Indicates that the facility is a Large Quantity Generator (LQG), Small Quantity Generator (SQG), Conditionally Exempt Small Quantity Generator (CEG), or not a generator (N).
Transporter	Indicates that the facility Transports waste subject to RCRA regulations. ("Y' indicates that the facility is in this universe).
Operating TSDF	Indicates that the facility is a Treatment, Storage or Disposal facility subject to any type of enforcement. It then specifies the type of facility (L - Land Disposal; I - Incinerator; B - BIF; S - Storage; T - Treatment)
IC in Place	Indicates that the facility has Institutional Controls in place. ("Y" indicates that the facility is in this universe).
El Indicator (HE / GW)	Indicates that the facility has controls in place for Environmental Indicators. HE - Human Exposures ('+' indicates the exposure exists and is under control; '-' indicates the exposure exists and is not under control; 'N' indicates the exposure does not exist) GW - Groundwater Release ('+' indicates the exposure exists and is under control; '-' indicates the exposure exists and is not under control; 'N' indicates the exposure does not exist)
Short-Term Gen	Indicates that the facility is a short term or one time event generator and not generating from ongoing processes.
Transfer Facility	Indicates that the facility transfers hazardous waste.
Offsite Receiver	Indicates that the facility, whether public or private, currently accepts hazardous waste from another site (site identified by a different EPA ID).
HSM	Indicates that the facility manages hazardous secondary material(s) (e.g. spent material, by-product or sludge) that when discarded, would be identified as hazardous waste.
Subpart K	Indicates that the facility has opted into the subpart K laboratory rule. It then specifies the type of facility (C - College or University; H - Teaching Hospital; N - Non-profit Research Institute; W - withdrawal from the rule)
Full Enforcement	Indicates that the facility is a Treatment, Storage or Disposal facility which is part of the Full Enforcement universe. It then specifies the type of facility (L - Land Disposal; I - Incinerator; B - BIF; S - Storage; T - Treatment)
CA Workload	Indicates that the facility is part of the Corrective Action Workload universe. ("Y" indicates that the facility is in this universe).
Active State Gen	Indicates that the facility is an Active State Generator. ('Y' indicates that the facility is in this universe).
Converter	Indicates that the facility is a Converter Treatment, Storage or Disposal facility. It then specifies the type of facility (L - Land Disposal; I - Incinerator; B - BIF; S - Storage; T - Treatment)
State TSDF	Indicates that the facility is a State Treatment, Storage or Disposal facility. It then specifies the type of facility (L - Land Disposal; I - Incinerator; B - BIF; S - Storage; T - Treatment)
State Unaddressed SNC	Indicates that the facility is a State Unaddressed Significant Non-Complier. ('Y' indicates that the facility is in this universe).
State Addressed SNC	Indicates that the facility is a State Addressed Significant Non-Complier. ("Y" indicates that the facility is in this universe).
State SNC w/ Compl. Sched	Indicates that the facility is a State Significant Non-Complier with a Compliance Schedule. ('Y' indicates that the facility is in this universe).
EPA Unaddressed SNC	Indicates that the facility is an EPA Unaddressed Significant Non-Complier. ("Y" indicates that the facility is in this universe).
EPA Addressed SNC	Indicates that the facility is an EPA Addressed Significant Non-Complier. ('Y' indicates that the facility is in this universe).
EPA SNC w/ Compl. Sched	Indicates that the facility is a EPA Significant Non-Complier with a Compliance Schedule. ("Y' indicates that the facility is in this universe).

^{*} Note: Penalty amount may not reflect all violations cited.

Report run on: November 18, 2014 - 12:55 PM

Description of codes used on the report:

Code	Description
В	indicates that the handler has filed for bankruptcy and bankruptcy litigation is in process.
0	indicates that all RCRA responsibilities for permitting/closure, corrective action, and compliance monitoring and enforcement at the facility have been formally transferred to the CERCLA program or state equivalent.
П	indicates that all responsible parties (owners/operators) for the handler have fled the country or are otherwise not available for prosecution.
L	indicates that the handler's case is tied up in litigation to the extent that further progress in achieving RCRA compliance through normal enforcement is not possible

Code	Description
ш	indicates that the handler was initially a non-notifier, subsequently determined to be exempt from requirements to notify
0	indicates that the handler is a former non-notifier.
×	indicates that the handler is a non-notifier.

Violation Type	Description
262.A	GENERATORS - GENERAL
262,B	GENERATORS - MANIFEST

Evaluation Type	Type Description
CEI	COMPLIANCE EVALUATION INSPECTION ON-SITE
CSE	COMPLIANCE SCHEDULE EVALUATION
NRR	NON-FINANCIAL RECORD REVIEW
Enforcement Type	Enforcement Description
120	WRITTEN INEORNAL

Enforcement Type	Enforcement Description
120	WRITTEN INFORMAL

* Note: Penalty amount may not reflect all violations cited.

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